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DOCKETS

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U.S. Department of Transportation
Docket Management System
Room Plaza 401
400 Seventh Street
SW Washington DC 20590-0001

Re: Docket Number FAA-2002-13293 - 3

FAA Part 135 review Committee:

Part 135.299 of the FAR's requires a pilot to pass a line check every 12 months in one of the types of aircraft he flies. The flight check must consist of at least one flight over one route segment and include takeoffs and landings.

The check pilot is required to determine whether the pilot being checked satisfactorily performs the duties and responsibilities of a pilot in command under Part 135 of the regulations and shall so Certify.

There is nothing stated that the pilot being checked is evaluated for his compliance with Company policy.

Several FSDO's, including the West Coast Regional Manager are saying that Company Policy and Procedures are evaluated on this check ride. If that were true then every FSDO inspector could be negligent or fraudulent if he/she is certifying that the pilot he checks is complying with each Company's Policies and Procedures.

The FAA does not train it's inspectors nor are they required to know each Company's Policies and Procedures. And I don't think it is plausible to do so.

Let me give you an example of my predicament. There are times when I am qualified to fly for three different Air Taxi operators. For several years, they accepted a Line check if it was taken in the same type aircraft. However the

local interpretation of Part 299 is that I must take a Line check with each Operator. Theoretically I could schedule 3 checks the same day with an FAA Inspector. We would leave from the Van Nuys airport and the routine flight is to a VOR, an approach to a near by Airport and return to VNY.

A G4 costs about \$4,000 dollars an hour to operate. Most Inspectors recognize that and do not demand a long ride. They comply with the regulation in a practical manner. So I would line up three different planes, take the first flight, park that plane, take the next flight, and then do it all a third time, all with the same Inspector.

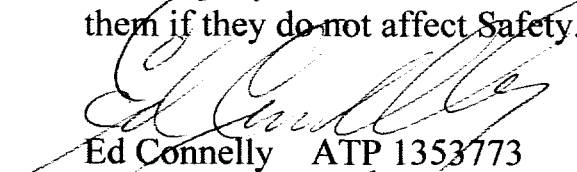
The Inspector will not ask me any questions about each Company's Policy because he does not know it. He is not trained in it or required to be trained. I flew for an Airline for 25 years and had many Line checks by the FAA. They could go from one Airline to several others to check their Line operations but they did not know each Company's P&P (Policy and Procedure).

The FAA is attempting to operate on a Budget. Local interpretation of FAR 135.299 is wasting a lot of valuable time and makes no contribution to Safety.

Where the FAA wants a determination of the Company Policy, it is already written in the Regulations and should be. The Line check is a check of Part 135 compliance. It can be accomplished in one check and should be. The FAA should stop wasting taxpayer dollars by allowing local jurisdictions to make their own rules.

Contract pilots are also being deprived of income because of inaccurate interpretation of the Regulation.

As I wrote this letter, it occurred to me that you might consider changing the wording to require Inspectors to know and check each Company's P&P. If you do that you must carefully take into account the Budget problems you will encounter. There are already rules in place to check a pilot's knowledge of Company P&P. You don't need any more. I doubt that you can afford them if they do not affect Safety.


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